## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : CHAPTER 13 CASE

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THOMAS SLOAN AND : DOCKET NO. 19-11196-elf JUDYTH SLOAN :

HON: Eric L. Frank

Debtors.

## NOTICE OF ENTRY OF APPEARANCE AND FOR REALCO INVESTMENTS, LP COMBINED WITH DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that RealCo Investments, LP, a party-in-interest and creditor in the above-captioned bankruptcy case ("Case"), appears in the Case by their attorneys, Gary P. Lightman, Esquire, and W. Lyle Stamps, who hereby (i) enters his appearance pursuant to Fed. R. Bankr. Proc. 2010(b) and (ii) requests, pursuant to Fed R. Bankr. P. 2002, 9007, 2013, 9014 and §342 of Title 11 of the United States Code, 11 U.S.C. §101 et seq. (the "Bankruptcy Code"), that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned each of the following addresses:

Gary P. Lightman, Esquire Lightman & Manochi 1520 Locust Street, 12th Floor Philadelphia, Pennsylvania 19102 (215) 545-3000 garylightman@lightmanlaw.com

Please take further notice that the foregoing demand includes not only the notices and papers referred to in the rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or information, written or oral, and whether transmitted or conveyed by mail, email, delivery, telephone, telegraph, telefax, or otherwise filed or made with regard to the referenced case and all proceedings therein.

This filing shall not be deemed or construed to be a waiver of RealCo Investments, LP's rights (i) to have final orders in noncore matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or

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proceeding related to this case, (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which RealCo Investments, LP is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Axis Realty Partners expressly reserve.

LIGHTMAN & MANOCHI

BY: /s/ Gary P. Lightman
GARY P. LIGHTMAN, ESQUIRE
1520 Locust Street, 12<sup>th</sup> Floor
Philadelphia, PA 19102
garylightman@lightmanlaw.com

Date: May 3, 2019 Attorneys for RealCo Investments, LP

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the date shown below he caused to be served a true and correct copy of the Notice of Entry of Appearance and for RealCo Investments, LP Combined with Demand for Service of Papers via U.S. first class mail and/or email upon the following:

Erik B. Jensen, Esquire 1528 Walnut Street, Suite 401 Philadelphia, PA 19102 Brandon@erikjensenlaw.com

United States Trustee Office of the U.S. Trustee 833 Chestnut Street, Suite 500 Philadelphia, PA 19107

Date: May 3, 2019

William C. Miller, Esquire Chapter 13 Standing Trustee 1234 Market Street, Suite 1813 Philadelphia, PA 19107

## LIGHTMAN & MANOCHI

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